

Patrick R. Leverty, Esq.
Nevada State Bar No. 8840
LEVERTY & ASSOCIATES LAW CHTD.
832 Willow Street
Reno, Nevada 89502
Ph: (775) 322-6636
Fax: (775) 322-3953
*Attorneys for Defendants O'Mara Law Firm, P.C.
and David O'Mara*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

NOETIC SPECIALTY INSURANCE)
COMPANY,)
)
Plaintiff,)
)
v.)
)
O'MARA LAW FIRM, P.C., a Nevada)
Professional Corporation; DAVID O'MARA, a)
individual; EDWARD C. WOOLEY and)
JUDITH WOOLEY, individually and as trustee)
of the EDWARD C. WOOLEY and JUDITH)
WOOLEY INTERVIVOS REVOCABLE)
TRUST 2000; LARRY J. WILLARD,)
individually and as trustee of the LARRY)
JAMES WILLARD TRUST FUND;)
OVERLAND DEVELOPMENT)
CORPORATION, a California Corporation,)
)
Defendants.)

Case No.: 3:20-cv-00110-LRH-EJY

**STIPULATION FOR EXTENSION OF
TIME TO RESPOND TO THE
COMPLAINT
(FOURTH REQUEST)**

Plaintiff NOETIC SPECIALITY INSURANCE COMPANY, by and through its counsel of record Sheri Thome, Esq., and Defendants O'MARA LAW FIRM, P.C. and DAVID O'MARA (collectively "O'MARA"), by and through their counsel of record, Patrick R. Leverty, Esq., stipulate that O'MARA shall have up to and including **Thursday, August 6, 2020**, to file a stipulation to dismiss this action with prejudice.

Counsel for the O'MARA Defendants signed acceptances of service of process on March 3, 2020 (Doc 16 and 17). Accordingly, the O'MARA Defendants response to the Complaint was originally due on Friday, April 17, 2020.

1 First, Plaintiff agreed Defendant O'MARA could have up to and including May 18, 2020, to
 2 respond to the Plaintiff's Complaint. Second, Plaintiff agreed Defendant O'Mara could have up to
 3 and including June 1, 2020, to respond to the Complaint. Third, Plaintiff agreed Defendant O'Mara
 4 could have up to and including June 22, 2020, to respond to the Complaint.

5 The parties have settled this case and the underlying case. The release has been reviewed and
 6 approved by all the parties. The parties are gathering signatures. Once the settlement release is fully
 7 executed, the parties will file a stipulation to dismiss this action with prejudice and with each party
 8 bearing their fees and costs. The parties anticipate receiving all signatures in the next few days and
 9 that a stipulation to dismiss will be filed shortly thereafter, but in order to not burden the Court with
 10 another request to extend time, hereby request until **Thursday, August 6, 2020**, to file a stipulation
 11 to dismiss.

12 This is the fourth (4th) requested extension.

13 DATED this 22nd day of June, 2020.

DATED this 22nd day of June, 2020.

14 WILSON, ELSER, MOSKOWITZ,
 15 EDELMAN & DICKER LLP

LEVERTY & ASSOCIATES LAW CHTD.

16 /S/ Sheri Thome
 17 Sheri Thome, Esq.
 18 300 South Fourth Street, 11th Floor
 Las Vegas, NV 89101
Attorneys for Plaintiff Noetic Specialty
Insurance Company

/S/ Patrick Leverty
 Patrick R. Leverty
 832 Willow Street
 Reno, NV 89502
Attorneys for Defendants O'Mara Law Firm,
P.C. and David O'Mara

19
 20 **IT IS SO ORDERED:**

21 
 22 DAYNA J. ZOUCHEK
 23 UNITED STATES MAGISTRATE JUDGE

24 DATED: June 23, 2020